Federal Defenders OF NEW YORK, INC.

Southern District 52 Duane Street-10th Floor, New York, NY 10007 Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton
Executive Director

Southern District of New York Jennifer L. Brown Attorney-in-Charge

August 10, 2021

BY EMAIL & ECF

Honorable Sidney H. Stein United States District Judge Southern District of New York 500 Pearl Street New York, NY 10007

MEMO ENDORSED

Re: United States v. Hai Jiao Dai,

19 Cr. 710 (SHS)

Dear Judge Stein:

I write to respectfully request that the Court authorize Pre-Trial Services to release Hai Jiao Dai's expired Chinese passport, effective immediately, so that Mr. Dai can begin the process of renewing his travel documents in anticipation of his completion of home detention. The Government, via Assistant United States Attorney Thomas John Wright, does not take a position on this request. United States Probation Officer Joseph Barlow, who is supervising Mr. Dai out of the Eastern District of New York, does not object to this request as long as Mr. Dai surrenders any renewed travel documents he obtains before the completion of his home detention, at which point they will be returned to him. Mr. Dai agrees to retrieve his expired passport according to these terms.

Request Granted.

Dated: New York, New York August 10, 2021

SO ORDERED:

Respectfully Submitted,

Andrew J Zalack, Esq. Assistant Federal Defender

(212) 417-8768

Counsel for Hai Jiao Dai

Cc: AUSA Thomas John Wright
United States Probation Officer Joseph Barlow

Stein, U